

III. REMARKS

Claims 1-22 are pending in this application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-22 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Malsheen (U.S. Patent No. 6,701,345), hereafter "Malsheen," in view of Acrophile: An Automated Acronym Extractor and Server, pp. 209-214, by Leah S. Larkey, Paul Ogilvie, M. Andrew Price, Department of Computer Science, University of Massachusetts, Amherst, MA, Brenden Tamilio, School of Cognitive Science, Hampshire College, Amherst, MA., hereafter "Larkey." Applicants respectfully submit that the references cited by the Office fail to teach or suggest each and every feature of the claimed invention.

For example, with respect to independent claim 1, and similarly claimed in independent claims 21 and 22, Applicants submits that the cited references fails to teach or suggest an abbreviation pattern generation process that creates one or more abbreviation patterns representing candidate abbreviations. The Office admits that Malsheen fails to specifically disclose this feature. Office Action, page 2. Instead, the Office relies on a passage of Larkey that describes reading a set of web pages to compile a database that lists acronym and expansion occurrences. Page 207, Building and Updataing the Database section. To this extent, the

building step of Larkey merely compiles acronyms and matching expansion occurrences and does not create patterns based on the acronyms that represent the acronyms.

In contrast, the present invention includes "...an abbreviation pattern generation process that creates one or more abbreviation patterns representing candidate abbreviations." Claim 1. As such, unlike Larkey, which merely compiles its acronyms and their expansions for listing in a database, the generation process of the claimed invention creates one or more abbreviation patterns that represent a candidate abbreviation. This created abbreviation pattern may, *inter alia*, subsequently be compared with a created definition pattern to determine which definition matches a particular abbreviation. Thus, the building and updating of the database of Larkey does not teach or suggest the generation of the one or more abbreviation patterns of the claimed invention. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claim 1, and similarly claimed in independent claims 21 and 22, Applicants submits that the cited references fails to teach or suggest a definition pattern generation process that creates one or more definition patterns representing candidate definitions. The Office equates this feature of the claimed invention with the looking up of a word in the abbreviations translation table of Malsheen to get an expansion value. Col. 7, line 20 through col. 8, line 54. However, this looking up of Malsheen is merely a table look up based on a keyword value to retrieve an expansion value. The lookup of Malsheen does not create a pattern based on the expansion value that defines the expansion value, itself.

In contrast, the present invention includes "...a definition pattern generation process that creates one or more definition patterns representing candidate definitions." Claim 1. As such, the definition pattern generation process of the claimed invention does not simply look up an

expansion value from a table based on a keyword as in Malsheen, but rather creates one or more definition patterns that represent a candidate definition. This created definition pattern may, *inter alia*, subsequently be compared with a created abbreviation pattern to determine which abbreviation is matched by a particular definition. Thus, the definition pattern generation process of the claimed invention is not taught or suggested by the looking up of Malsheen. Larkey does not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With respect to dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However,

Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "H. E. Webb", written over a horizontal line.

Hunter E. Webb
Reg. No.: 54,593

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Hoffman, Warnick & D'Alessandro LLC
75 State Street, 14th Floor
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)

RAD/hew